

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTEGRATED HEALTH SERVICES OF )  
CLIFF MANOR, INC., INTEGRATED )  
HEALTH SERVICES AT RIVERBEND, ) Civil Action No. 04-910 (GLS)  
INTEGRATED HEALTH SERVICES AT )  
SOMERSET VALLEY, INC., ALPINE )  
MANOR, INC., BRIARCLIFF NURSING )  
HOME, INC., SPRING CREEK OF IHS, INC., )  
FIRELANDS OF IHS, INC., ELM CREEK OF )  
IHS, INC., and IHS LONG TERM CARE )  
SERVICES, INC., )  
)  
Plaintiffs, )  
)  
v. )  
)  
THCI COMPANY LLC, )  
)  
Defendant, )  
)  
v. )  
)  
ABE BRIARWOOD CORPORATION and )  
JOHN DOES 1-10, )  
)  
Additional Counterclaim )  
Defendants, )  
)

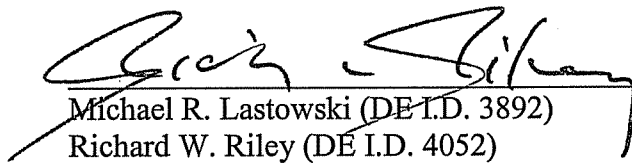
**PLAINTIFFS' RENEWED REPLY MEMORANDUM IN SUPPORT OF RENEWED  
MOTION FOR PARTIAL SUMMARY JUDGMENT PURSUANT TO FED. R. CIV. P. 56**

Plaintiffs, and in particular Plaintiff IHS Long Term Care Services, Inc. (collectively, “Plaintiffs”), by and through their undersigned counsel, file this reply memorandum in opposition to Defendant THCI Company LLC’s Renewed Cross-Motion for Partial Summary Judgment and Response to Plaintiffs’ Renewed Motion for Partial Summary Judgment Pursuant to Fed. R. Civ. P. 56 filed on May 10, 2006 at Docket No. 166 and in further support of

Plaintiffs' Renewed Motion for Partial Summary Judgment Pursuant to Fed. R. Civ. P. 56 filed on April 12, 2006 at Docket No. 157. Plaintiffs hereby renew the Plaintiffs' Reply Memorandum of Law in Support of Motion for Partial Summary Judgment filed on June 22, 2005 at Docket No. 76 and accompanying Reply Declaration in Support of Partial Summary Judgment Motion filed on July 22, 2005 at Docket No. 77, which are incorporated herein as though fully set forth at length.

DATED: May 16, 2006

**DUANE MORRIS LLP**



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Services of Cliff Manor, Inc. et al. and  
Counterclaim Defendant Abe Briarwood Corp. and  
non-parties Leonard Grunstein and Rubin Schron*